

Flanagan, Sarah

From: Vaughn, Stephanie
Sent: Monday, June 03, 2013 11:18 AM
To: Flanagan, Sarah; Hick, Patricia
Subject: FW: Comments, RM 10.9 Final Design and PAMP....
Attachments: Draft PAMP Partial Comments.docx; Comments.docx

From: Vaughn, Stephanie
Sent: Thursday, May 23, 2013 4:37 PM
To: 'Robert Law'
Subject: Comments, RM 10.9 Final Design and PAMP....

Hi Rob,

Attached are some comments on the final design and Perimeter Air Monitoring Plan submitted earlier this week.

I have not yet had a chance to really review the PAMP, so may have some additional comments, and NJDEP is still planning to submit comments early next week (definitely on the PAMP, maybe on the final design report). For the record, you already received separate comments from EPA and NJDEP on the Water Quality Monitoring Plan.

When should we expect to see the dredging contractor's work plan?

Thanks,
Stephanie

PRELIMINARY/PARTIAL COMMENTS
RIVER MILE 10.9
DRAFT PERIMETER AIR AND NOISE MONITORING PLAN
LOWER PASSAIC RIVER STUDY AREA
DATED MAY 2013

<u>No.</u>	<u>General Comment</u>
1	There are several typographical errors throughout the document. Please address for the next version.

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
1	Section 1.3	The monitoring plan focuses on impacts associated with the dredged material, itself. Please mention where consideration was made for the emissions of the heavy equipment to be utilized during the removal action.
2	Page 5, Section 3.1.2	This section states that Mobile #1 "will be moved to pre-determined locations throughout the park as well as at random locations as needed." Please clarify under what conditions these additional "random locations" are needed.
3	Page 7, Section 3.3	Given the proposed rotating schedule of COPC particulate analysis, consideration should be made to modify the plan in the event of a warning or action level exceedance. Please clarify and revise, as necessary.
4	Page 8, Table 3-1, Particulate and Mercury	For particulate collection the table needs to indicate the smallest particle size that will be captured by the filter.
5	Page 8, Table 3-1, Mercury	The filter described in this sampling approach will not capture the level of contamination associated with mercury vapor. It is recommended that an appropriate mercury vapor absorbent be added to the sample train to monitor the total impact from mercury that may occur during the removal action.
6	Page 10, Section 3.7.1	This section states that the dredging duration is anticipated to be less than 60 days, while other sections of the report refer to an anticipated duration of 60 to 90 days. Please clarify.
7	Page 11, Section 3.7.3	Is the reference to "Monitoring Location Section" intended to reference Section 3.1 of the Plan? If so, please add the section number.
8	Page 12, Table 4-1	How were the warning and action levels determined? Please provide the basis and justification for the selection of these concentrations.
9	Page 13, Table 4-2	a. If corrective actions are implemented upon exceedance of a warning level and concentrations continue to rise, such that an action level is exceeded, what is the justification for not implementing work stoppage? Please clarify and revise, as necessary. b. Please adjust Table 4-2 headers on page 14, they shifted.
10	Page 15, Section 4.5	What is the intent of the 15-minute limitation to restore monitoring levels below the action value? Please clarify what happens if this time constraint is not met.
11	Page 18, Figure 1	Please define the asterisk associated with DW #3*, as shown on this figure.
12	Page 9, Table 3-2	Recommend that Hydrogen Sulfide is monitored continuously, not just "if odor is detected".

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
13	Page 14, Table 4-2	Two action levels for each of three <u>sampling</u> parameters (See pages 13 & 14). All six of them say, "Notify EPA within 24 hours of receipt of analytical data." Each of these actions should include the statement, "and adjust real-time action levels if needed."
14	Appendix A, SOP No. KNOX-MT-009, Section 1.3	The method requires sampling in accord with Methods #29, D6784-02 and 0060. These sampling methods are not provided as part of this SOP and may differ from those described in the air monitoring plan. The Sampling plan and SOPs must show that one or more of these methods allow air sampling are as described in Table 3-1 of the sampling plan.

COMMENTS
RIVER MILE 10.9
FINAL DESIGN REPORT
LOWER PASSAIC RIVER STUDY AREA
DATED MAY 3, 2013

<u>No.</u>	<u>General Comment</u>
1	The Final Design Report, associated figures, appendices, and attachments should all be updated to reflect the changes in offsets and conditions as specified by Jersey City Municipal Utilities Authority in May 2, 2013 letter. Note that additional modifications to the offsets may be made depending on the results of the subsurface survey being conducted.

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
1	Page 2-3, 3 rd Paragraph	The first sentence of this the 3 rd full paragraph on this page has a typo. Please remove the word "such."
2	Page 3-5, Section 3.7	The text states that the bridge openings will be coordinated to occur at night, while elsewhere in the text (Sections 4.3.1.3 and 4.3.5) the need to only mobilize barges +/- 1 hour around low tide is stated. Please clarify the intention to open bridges and time when barges will be in transit. Also, either here or elsewhere in the document, please state where barges will be staged while awaiting bridge openings.
3	Page 4-2, Section 4.2.3	When and how will it be determined that additional dredging is needed due to sloughing? Please clarify and revise as necessary.
4	Page 4-3, Section 4.3.2	Will the dredge barge be spudded in all locations?
5	Page 4-8, Section 4.4.3	Consider adding placement of sand over the dredged area as a BMP.
6	Section 4.6	Please assure that this section and the stand alone WQMP are consistent in the final version.
7	Figure 4-1	The upper tolerance should be 3 inches for any single measurement (for consistency with specification tolerance) and be set to at or below plan elevation on an average basis for each dredge management unit. Please revise as necessary.
8	Page 7-1, Section 7.1	Why was effectiveness of sand/active layer section of the cap lowered from 250 years to 100 years? Please clarify.
9	Page 7-3, Section 7.2.2.2	Please provide written documentation of the information provided by Upal Ghosh.
10	Page 7-12, Section 7.12	Please add a reference to Appendix K here. In addition, clarify whether any aspects of the cap design were modified/included because of long-term monitoring needs.

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
11	Appendix C and Cap Design	We are continuing to evaluate seepage meter results and cap design. Suggest CPG engage Dr. Reible to present sensitivity of model parameters relative to cap design and make recommendation to CPG on final design parameters.
12	Appendix D, Drawing C-2	Additional sampling (3 replicates of composites from 9 stations +/- or approximately 9 discrete samples from 0-6 inch interval) is recommended to document chemical concentrations of new surface material of "no capping area" that will remain uncapped post-TCRA.
13	Appendix E, Sec 31 23 24, Part 3.01, C, 4	The average elevation for any 10 foot by 10 foot grid should be at or below the plan elevation. Any individual elevation measurement should be no greater than the stated 3-inch maximum tolerance. Please revise as necessary.
14	Appendix E	Revise based on outcome of WQMP and Cap Design comments.
15	Appendix I, Section 7	Change Order Request and Nonconformance Reports should be sent to USEPA within 1 business day of issuance.
16	Appendix I, Section 8	Any corrective measure plans should be sent to US EPA within 1 business day of issuance.